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Corp. d/b/a Zenú Products Co.
and Wilson Zuluaga*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

INDUSTRIA DE ALIMENTOS ZENÚ S.A.S.,
Plaintiff,

v.

LATINFOOD U.S. CORP. d/b/a ZENÚ
PRODUCTS CO. and WILSON ZULUAGA
Defendants/Counter Plaintiff,

Civil Action No: 2:16-CV-06576

LATINFOOD U.S. CORP. d/b/a ZENÚ
PRODUCTS CO.,
Defendants/Counter Plaintiff

v.

INDUSTRIA DE ALIMENTOS ZENÚ S.A.S
and CORDIALSA USA, INC.
Counter Defendants.

**DECLARATION OF MARK J. INGBER,
ESQ.**

I, MARK J. INGBER, make this declaration pursuant to 28 U.S.C. § 1746. I

hereby state as follows:

1. I am an attorney with The Ingber Law Firm, counsel to Latinfood U.S. Corp. d/b/a Zenu Products Co. and Wilson Zuluaga (“Defendants” or “Latinfood”) in the above-captioned matter.

2. I submit this declaration in connection with my August 24, 2023 letter to the Court. Except where otherwise stated, I make this declaration based on my personal knowledge and my review of the record in this case.
3. A true and correct copy of the Defendants' First Set of Requests For Production of Documents to Plaintiff dated May 15, 2017 and Defendants' Second Set of Requests For Production of Documents to Plaintiff dated September 15, 2018 are annexed hereto as **Exhibit A**.
4. A true and correct copy of Plaintiff's Response to Defendants' First Set of Requests for Production of Documents dated August 9, 2017 is annexed hereto as **Exhibit B**.
5. A true and correct copy of Plaintiff's Response to Defendants' Second Set of Requests for Production of Documents dated October 29, 2018 is annexed hereto as **Exhibit C**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

By: /s/ Mark J. Ingber
Mark J. Ingber, Esq.

Dated: Livingston, New Jersey
August 23, 2023